

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

SHANNON LEWANDOWSKI,

Plaintiff,

-vs-

Case No. 16 CV 1089

CITY OF MILWAUKEE,

Defendant.

**DEPOSITION OF
JOHNNY SGRIGNUOLI
(Pages 1 - 53)**

**Mequon, Wisconsin
February 28, 2019
10:00 a.m. to 1:00 p.m.**

**PHYLLIS KAPARIS
Registered Professional Reporter**

Page 2		Page 4	
1	APPEARANCES	1	PROCEEDINGS.
2	HEINS EMPLOYMENT LAW PRACTICE LLC, 1001	2	(Exhibits 1-4 were marked.)
3	West Glen Oaks Lane, Suite 101, Mequon, Wisconsin	3	JOHNNY SGRIGNUOLI, called as a
4	53092, by MS. JANET L. HEINS	4	witness herein by the Plaintiff, after having
5	(jheins@heinslawoffice.com), appeared on behalf of the	5	been first duly sworn, was examined and testified
6	Plaintiff.	6	as follows:
7	RETTKO LAW OFFICES, S.C., 15460 West	7	EXAMINATION
8	Capitol Drive, Suite 150, Brookfield, Wisconsin 53005,	8	BY MS. HEINS:
9	by MR. WILLIAM R. RETTKO (bill@rettkolaw.com), appeared	9	Q Good morning. Could you give us your name and
10	on behalf of the Witness.	10	spell it for the record, please?
11	OFFICE OF THE CITY ATTORNEY, Frank P.	11	A Sure. Johnny Sgrignuoli, J-O-H-N-N-Y,
12	Zeidler Municipal Building, 841 North Broadway, 7th	12	S-G-R-I-G-N-U-O-L-I.
13	Floor, Milwaukee, Wisconsin 53202-3653, by MR. ROBIN	13	Q You understand that you're here today to give
14	PEDERSON (rpederson@milwaukee.gov), Assistant City	14	testimony in the case of Shannon Lewandowski
15	Attorney, appeared on behalf of the Defendant.	15	versus The City of Milwaukee?
16		16	A Yes.
17		17	Q How long have you known Shannon Lewandowski?
18	INDEX	18	A I would estimate -- I'm just trying to think back
19		19	to when I was assigned to the CIB. I would
20	WITNESS EXAMINATION PAGE	20	estimate -- oh, boy. Bear with me for a second
21	JOHNNY SGRIGNUOLI	21	because it's -- maybe 2012 or '13, but I'm
22	By Ms. Heins..... 4	22	guessing when I was assigned there. It's been a
23	By Mr. Pederson..... 99	23	while.
24	By Ms. Heins.....100	24	Q Okay. Well, let's go through that. You're
25		25	currently employed by the Milwaukee Police

Page 3		Page 5	
1	EXHIBITS	1	Department?
2	EXHIBIT DESCRIPTION ID'D	2	A Yes.
3	Exhibit 1 IAD Case Management Record..... 23	3	Q And what's your current position?
4	Exhibit 2 Squad Accident Report..... 52	4	A I work at the Criminal Investigation Bureau as a
5	Exhibit 3 Lewandowski Memo RE: IOD/FMLA..... 51	5	Captain.
6		6	Q All right. And how long have you been a Captain
7	Exhibit 4 Employee Case File (* CONFIDENTIAL *)..... 53	7	in the CIB?
8		8	A 2015, I believe August.
9		9	Q Okay. Prior to August, 2015 what were your
10	*** CONFIDENTIAL DESIGNATION ***	10	duties or what was your title with the Milwaukee
11	Pages 54 - 106	11	Police Department?
12		12	A Immediately prior?
13		13	Q Yes.
14	DOCUMENT REQUEST	14	A Lieutenant in the Milwaukee Police Department
15	1. Page 56, line 10	15	assigned to the -- I believe it was called the
16	Any documentation that Captain Scignuoli submitted	16	Investigations Division back then. We
17	requesting reversal of his discipline and any document	17	restructured a few times, so.
18	issued by the department in response to that.	18	Q Right.
19		19	A It was the same thing, detectives.
20		20	Q Okay. And how long did you hold that position?
21		21	A It's hard to say. I was assigned -- I know I was
22	(Original transcript sent to Attorney Heins)	22	assigned to Internal Affairs prior to that. I'm
23	(Original exhibits attached to original transcript)	23	guessing a year, year-and-a-half. It's really
24		24	kind of hard to remember that far.
25		25	Q And at some point during that year,

Page 6

1 year-and-a-half were you also an Acting Captain?
2 **A Yes.**
3 Q And how did that come about?
4 **A The Captain retired that was assigned there, Chad**
5 **Wagner, and I was a Lieutenant, and the Assistant**
6 **Chief then, Kurt Leibold, designated me as the**
7 **person in charge.**
8 Q And how long did you serve in that capacity?
9 **A Six months maybe, give or take.**
10 Q Okay. And before being a Lieutenant in the
11 Investigations Division, what was your title?
12 **A Before I was promoted to Lieutenant or --**
13 Q Yes.
14 **A -- before I was assigned there? I was a**
15 **Sergeant.**
16 Q How long were you a Sergeant?
17 **A From 2000 until 2009?**
18 Q And where were you assigned as Sergeant?
19 **A Initially District 6 in 2000. And then a short**
20 **time after that I -- I don't remember exact**
21 **dates -- I went to District 3. Then -- you're**
22 **asking me to go back 20 years. I really don't**
23 **recall exactly, but I do know all the assignments**
24 **I had. I just don't know them in chronological**
25 **order.**

Page 7

1 Q That's fine. I'm just interested in the
2 different assignments.
3 **A Okay. So patrol at District 6. District 3, I**
4 **worked in the Intelligence Division, which was**
5 **part of the Criminal Investigation Bureau. I**
6 **worked at Internal Affairs. I worked at**
7 **District 5, and then I was promoted to Lieutenant**
8 **out of that assignment at District 5.**
9 Q Okay. And in your assignment as Captain, are you
10 assigned to a particular district?
11 **A I'm assigned to a division, the Narcotics**
12 **Division, the High Intensity Drug Trafficking**
13 **Areas. The acronym is HIDTA.**
14 Q And the detectives who work under you, what
15 districts are they working out of?
16 **A They work out of the same building. We don't**
17 **have a specific district. In fact, the personnel**
18 **there, many of them are deputized federal agents,**
19 **so we have -- they have jurisdiction all over the**
20 **state, quite frankly, the Midwest Region. So**
21 **they're responsible for the entire -- as far as**
22 **City of Milwaukee, our entire jurisdiction.**
23 Q Okay. As a Lieutenant, and some portion of which
24 Acting Captain, what district were you assigned?
25 **A North side districts, District 3, 5, eventually**

Page 8

1 **District 7 and 4. Again, another restructuring**
2 **occurred where it was initially District 3 and 5,**
3 **and then 7 and 4 were added. So all the north**
4 **side districts essentially.**
5 Q Okay. When did you start with the Milwaukee
6 Police Department initially?
7 **A March of 1994.**
8 Q Okay.
9 **A March 14th.**
10 Q How long did you spend in Internal Affairs or
11 whatever it's been called during the various
12 reorganizations?
13 **A I spent time there as a Sergeant, and then I**
14 **spent time there as a Lieutenant. I would say**
15 **total time maybe two-and-a-half years.**
16 Q Okay.
17 **A It's an estimate.**
18 Q Okay. Was part of that time in Internal Affairs
19 in 2009?
20 **A So I have to recall.**
21 Q Sure.
22 **A I don't think so. I think I was at District 7**
23 **and District 2. And then I went to the -- what**
24 **was then known as Neighborhood Task Force. And**
25 **then I went to Internal Affairs, so it would have**

Page 9

1 **been after '09, maybe '10 or '11.**
2 Q Okay.
3 **A I don't think I got sent there in '09.**
4 Q And when was your other stint in Internal
5 Affairs?
6 **A That was as a Sergeant, and that would have been**
7 **in '07 or '08 perhaps, because it was just prior**
8 **to going to District 5. And then I got promoted**
9 **to Lieutenant.**
10 Q Okay.
11 **A It's hard to remember exact dates going back that**
12 **far.**
13 Q You do get shifted around fairly regularly in the
14 department, right?
15 **A I've been lucky to have a very wide variety of**
16 **assignments, yes.**
17 Q Okay. Can you describe what your duties are as
18 Captain in the CIB?
19 **A I essentially at this point oversee all**
20 **operations both in the sense of physical**
21 **operations that occur with our detectives and**
22 **police officers and sergeant and lieutenant.**
23 **I also oversee and manage budgets**
24 **that the Milwaukee Police Department and the**
25 **HIDTA initiative have memorandums of**

Page 10	Page 12
<p>1 understanding with, supervise all of the</p> <p>2 subordinate personnel that are there, and I work</p> <p>3 as a liaison with federal agencies, private and</p> <p>4 public sector partners, and all of the partners</p> <p>5 back at the Police Administration Building. So a</p> <p>6 variety of different duties.</p> <p>7 Q Okay. And you mentioned that as a Lieutenant in</p> <p>8 the Investigations Division that you supervised</p> <p>9 detectives.</p> <p>10 A Yes.</p> <p>11 Q Do you still supervise detectives as Captain?</p> <p>12 A Not directly, but I am responsible for all MPD</p> <p>13 personnel that are assigned to me, yes.</p> <p>14 Q Okay. And when you were Acting Captain, were you</p> <p>15 also supervising detectives?</p> <p>16 A Yes.</p> <p>17 Q And when I speak about detectives, are there</p> <p>18 detectives in different divisions or are they all</p> <p>19 in CIB?</p> <p>20 A Well, the Criminal Investigation Bureau is a</p> <p>21 bureau that has divisions within it. So within</p> <p>22 the bureau, you have members assigned to violent</p> <p>23 crimes, you have members assigned to homicide,</p> <p>24 members assigned to sensitive crimes, robbery,</p> <p>25 property crimes. So there's a lot of</p>	<p>1 A 2000.</p> <p>2 Q Okay. That seemed too easy.</p> <p>3 A That one I know.</p> <p>4 Q I have a friend who got married in 2000 also, so</p> <p>5 that he could always do the math easily on how</p> <p>6 long he'd been married.</p> <p>7 Do you have children?</p> <p>8 A Yes.</p> <p>9 Q How many?</p> <p>10 A Three.</p> <p>11 Q What are their ages, roughly?</p> <p>12 MR. RETTKO: What's the relevance of</p> <p>13 this?</p> <p>14 MS. HEINS: Just getting personal</p> <p>15 background information.</p> <p>16 MR. RETTKO: You can answer this one.</p> <p>17 THE WITNESS: 16, 15, 13.</p> <p>18 BY MS. HEINS:</p> <p>19 Q Okay. All right. So you've known Shannon</p> <p>20 Lewandowski for six or seven years, I think you</p> <p>21 said since 2012 or 2013. Does that sound right?</p> <p>22 A As soon as I got assigned to the Acting Captain</p> <p>23 job. She worked in the -- I believe it was</p> <p>24 called the Central Division or Central Sector of</p> <p>25 the CIB, and I was overseeing that. So when I</p>
Page 11	Page 13
<p>1 subsections. So they all work for the Criminal</p> <p>2 Investigation Bureau, each division, if that</p> <p>3 makes it clear.</p> <p>4 Q Yes. Thank you.</p> <p>5 What is your highest level of</p> <p>6 education?</p> <p>7 A Marquette University, graduate.</p> <p>8 Q In what?</p> <p>9 A Business school in leadership.</p> <p>10 Q What was the highest degree you received from</p> <p>11 them?</p> <p>12 A A master's degree.</p> <p>13 Q So MBA?</p> <p>14 A No, no. I'm not good with math.</p> <p>15 Q All right. And obviously then you have an</p> <p>16 undergraduate degree.</p> <p>17 A From UWM, Milwaukee.</p> <p>18 Q Okay. Is that a bachelor of science?</p> <p>19 A Yes. In fact, I'm just wrapping up at Marquette</p> <p>20 very shortly, a couple of weeks.</p> <p>21 Q Okay. Are you married?</p> <p>22 A Yes.</p> <p>23 Q How long?</p> <p>24 A Nineteen years.</p> <p>25 Q So --</p>	<p>1 got assigned there is when she worked for me.</p> <p>2 Q Okay. How would you describe Shannon</p> <p>3 Lewandowski?</p> <p>4 A Can you be more specific?</p> <p>5 Q Well, I want to talk about personally and</p> <p>6 professionally. So start with whichever one you</p> <p>7 want.</p> <p>8 A Well, professionally is how I know her.</p> <p>9 Q Okay.</p> <p>10 A And a very hard worker, pays attention to detail,</p> <p>11 very persistent. What else can I say? Goes the</p> <p>12 extra mile, very -- just a thorough, very</p> <p>13 hard-working detective --</p> <p>14 Q Okay.</p> <p>15 A -- would be the best way to describe her.</p> <p>16 Q Did you know her before she was a detective?</p> <p>17 A I don't think so.</p> <p>18 Q Okay.</p> <p>19 A I don't recall that, no.</p> <p>20 Q Okay. So how would you describe her personally,</p> <p>21 say personality-wise?</p> <p>22 A Very independent, outspoken, confident,</p> <p>23 dedicated. That's about it.</p> <p>24 Q Okay. Generally speaking if a member of the</p> <p>25 department has some type of complaint against</p>

<p style="text-align: right;">Page 14</p> <p>1 another member of the department, is there a</p> <p>2 particular agency or bureau or some division of</p> <p>3 the department that investigates those?</p> <p>4 A If you're talking about a personnel complaint,</p> <p>5 yes, it would be the Internal Affairs Division.</p> <p>6 Q When you were in the Internal Affairs Division,</p> <p>7 either time, did you ever see a complaint come</p> <p>8 across from Shannon Lewandowski?</p> <p>9 A I don't remember. I don't recall that. Can you</p> <p>10 be more specific?</p> <p>11 Q Yes. I'm trying to think of how to describe it</p> <p>12 in a short period of time. Do you recall seeing</p> <p>13 a complaint by Shannon Lewandowski that Chief</p> <p>14 Flynn had come to her house drunk and hit on her?</p> <p>15 A Absolutely not.</p> <p>16 Q You don't recall seeing anything like that while</p> <p>17 you were in Internal Affairs?</p> <p>18 A I don't.</p> <p>19 Q Did you ever hear about it?</p> <p>20 A No.</p> <p>21 Q Okay. And you are aware that Detective</p> <p>22 Lewandowski filed complaints about being</p> <p>23 discriminated against in the department as a</p> <p>24 woman, right?</p> <p>25 A I believe so, but I don't recall specifics. I</p>	<p style="text-align: right;">Page 16</p> <p>1 Q That or documented any other way.</p> <p>2 MR. RETTKO: Just one question for</p> <p>3 clarification. As Captain he was never her</p> <p>4 direct supervisor, and I don't believe he ever</p> <p>5 said he was her direct supervisor.</p> <p>6 MS. HEINS: Right. That's not what</p> <p>7 I'm asking.</p> <p>8 MR. RETTKO: Okay.</p> <p>9 MS. HEINS: He's two levels up</p> <p>10 obviously. But let me go back.</p> <p>11 BY MS. HEINS:</p> <p>12 Q When Shannon Lewandowski was working under your</p> <p>13 indirect supervision, I think you mentioned you</p> <p>14 saw and approved performance reviews that were</p> <p>15 performed on her?</p> <p>16 A Anything for the division would have ultimately</p> <p>17 come through me, yes.</p> <p>18 Q Okay. Do you recall seeing any either</p> <p>19 performance reviews or other documents that</p> <p>20 indicated any kind of performance issue with</p> <p>21 Shannon Lewandowski?</p> <p>22 A I don't recall. If she would have had an</p> <p>23 evaluation done while I was there, I would have</p> <p>24 seen it. But that could be verified by my</p> <p>25 signature on there.</p>
<p style="text-align: right;">Page 15</p> <p>1 know I had been in the City Attorney's Office</p> <p>2 prior regarding something that Shannon had filed,</p> <p>3 but I don't know the details of it.</p> <p>4 Q Were you ever working in Internal Affairs when</p> <p>5 she filed any of those complaints?</p> <p>6 A I don't believe so.</p> <p>7 Q Okay. You mentioned that you were in the City</p> <p>8 Attorney's Office discussing at least one of</p> <p>9 those complaints. Was that one that included</p> <p>10 allegations against you personally?</p> <p>11 A I think so. That would have been the reason I</p> <p>12 was there.</p> <p>13 Q Okay. That was my follow-up question.</p> <p>14 A Yeah.</p> <p>15 Q Were you ever responsible for doing a performance</p> <p>16 review on Shannon Lewandowski?</p> <p>17 A I would have not been directly responsible for</p> <p>18 doing it, but I would have seen one of the</p> <p>19 Lieutenant's reports. It would have come through</p> <p>20 me, yes.</p> <p>21 Q Okay. Do you recall there being any issues with</p> <p>22 Shannon Lewandowski's performance while you were</p> <p>23 one of her supervisors?</p> <p>24 A You mean specifically something documented on her</p> <p>25 performance review?</p>	<p style="text-align: right;">Page 17</p> <p>1 Q Right.</p> <p>2 A I don't remember any positives or negatives. I</p> <p>3 just go back to what I recall about her work</p> <p>4 performance.</p> <p>5 Q Okay. Do you recall an occasion where you</p> <p>6 received a copy of an e-mail she sent to Chief</p> <p>7 Flynn about an arrest warrant?</p> <p>8 A I don't recall that.</p> <p>9 Q Okay. Did Chief Flynn have an open door policy?</p> <p>10 A Not to me he didn't. I never heard that.</p> <p>11 Q All right. So if he had not had an open door</p> <p>12 policy, did that mean that he expected everyone</p> <p>13 to go through the chain of command with</p> <p>14 everything?</p> <p>15 A That was made very clear to us as commanders,</p> <p>16 yes, chain of command.</p> <p>17 Q How was that made clear to you?</p> <p>18 A Just through our Assistant Chief and through the</p> <p>19 policies.</p> <p>20 Q Okay. Do you recall a suspect named Anthony</p> <p>21 Bradley?</p> <p>22 A I don't.</p> <p>23 Q In case it helps your recollection, he was an</p> <p>24 individual who ultimately -- to use a</p> <p>25 colloquialism -- committed suicide by cop.</p>

<p style="text-align: right;">Page 18</p> <p>1 A I'm sorry. I don't remember the name.</p> <p>2 Q Okay.</p> <p>3 A Or the incident.</p> <p>4 Q All right. Well, as part of -- have you reviewed</p> <p>5 any of the documents in this lawsuit?</p> <p>6 A I don't remember. I don't recall.</p> <p>7 Q Okay.</p> <p>8 A I don't know if that's been made accessible to</p> <p>9 me.</p> <p>10 Q All right. Well, referring to the Complaint in</p> <p>11 the case, which is already part of the record, so</p> <p>12 it's the Amended Complaint in particular which</p> <p>13 would be ECF 47, for reference later. Just to be</p> <p>14 brief, Ms. Lewandowski details that she had</p> <p>15 received an informant tip on where to find a</p> <p>16 wanted person on December 6, 2014. And she</p> <p>17 describes her efforts to get someone to authorize</p> <p>18 a warrant and indicates that she -- after various</p> <p>19 unsuccessful attempts she e-mailed you,</p> <p>20 Lieutenant Lough, Lieutenant Hanley, Captain</p> <p>21 Smith, Lieutenant Armbruster and Chief Flynn</p> <p>22 indicating that she had had problems getting</p> <p>23 anyone to authorize this, and ultimately did</p> <p>24 receive clearance to arrest the suspect, but he</p> <p>25 later committed suicide by cop. Any of that</p>	<p style="text-align: right;">Page 20</p> <p>1 Q All right. Would it also present a problem for</p> <p>2 the individuals in the intervening chain of</p> <p>3 command for allowing one of their subordinates to</p> <p>4 skip the chain of command?</p> <p>5 A No problem at all.</p> <p>6 Q No? So you would have no reason to tell her not</p> <p>7 to cross you again?</p> <p>8 MR. RETTKO: I'm going to object. It</p> <p>9 assumes a fact not yet in evidence. He has</p> <p>10 denied that he ever said that to her.</p> <p>11 But go ahead and answer.</p> <p>12 THE WITNESS: Can you ask me that</p> <p>13 question again?</p> <p>14 BY MS. HEINS:</p> <p>15 Q Sure. So you would have no reason to tell</p> <p>16 Ms. Lewandowski not to cross you again?</p> <p>17 A Absolutely not. I don't think I ever used that</p> <p>18 term in my life.</p> <p>19 Q All right. Did you ever tell Ms. Lewandowski</p> <p>20 that she should apologize for anything?</p> <p>21 A No, I don't -- no.</p> <p>22 Q Okay. Did you tell Ms. Lewandowski that it would</p> <p>23 be her career if she did that again?</p> <p>24 A Absolutely not.</p> <p>25 Q You mentioned a moment ago that sending such an</p>
<p style="text-align: right;">Page 19</p> <p>1 sound familiar to you?</p> <p>2 A I'm sorry. It doesn't.</p> <p>3 Q Okay. She also indicates that a few days after</p> <p>4 she had sent this e-mail you, who were Acting</p> <p>5 Captain at the time, talked to her in the hallway</p> <p>6 about that e-mail. Do you recall doing that?</p> <p>7 A I don't.</p> <p>8 Q Did you ask her any words to the effect of, what</p> <p>9 the hell is wrong with you? Why would you write</p> <p>10 to the Chief?</p> <p>11 A No.</p> <p>12 Q Okay. Did you tell her not to write any more</p> <p>13 e-mails to the Chief?</p> <p>14 A No.</p> <p>15 Q Did you tell her not to do anything to cross you</p> <p>16 again?</p> <p>17 A No.</p> <p>18 Q Okay. Assuming for the sake of this question</p> <p>19 that Shannon Lewandowski did send an e-mail</p> <p>20 directly to Chief Flynn without going through the</p> <p>21 chain of command, is that something that would</p> <p>22 reflect poorly on the individuals that she</p> <p>23 skipped over in order to e-mail the Chief?</p> <p>24 A I think it reflects poorly on the person that</p> <p>25 sent the e-mail.</p>	<p style="text-align: right;">Page 21</p> <p>1 e-mail outside of the chain of command would</p> <p>2 reflect poorly on the person who sent it.</p> <p>3 A I believe so, yes.</p> <p>4 Q Why?</p> <p>5 A Well, that's why we have layers of supervision.</p> <p>6 You can take your concerns to your immediate</p> <p>7 supervisor, and if that doesn't resolve it, you</p> <p>8 go to the next level. I can't, nor have I ever</p> <p>9 sent an e-mail directly above my direct</p> <p>10 supervisor's boss. That isn't how we train</p> <p>11 people. That isn't what's expected.</p> <p>12 Q Okay. All right. Did you ever personally</p> <p>13 reprimand Shannon Lewandowski for anything?</p> <p>14 A Can you clarify reprimand?</p> <p>15 Q Admonish, to use slang, to yell at her or</p> <p>16 indicate that you were unhappy with something she</p> <p>17 had done.</p> <p>18 A No.</p> <p>19 Q Okay. In the end of the 2014 and the beginning</p> <p>20 of 2015, what was department's policy or approach</p> <p>21 to overtime?</p> <p>22 A I can give you a general description. Overtime</p> <p>23 policy has always been the same since I was an</p> <p>24 officer.</p> <p>25 Q All right. And what is that?</p>

6 (Pages 18 to 21)

<p style="text-align: right;">Page 22</p> <p>1 A It's used when necessary. Supervisors are 2 charged with monitoring it and making sure 3 appropriate overtime is allocated in a productive 4 way. 5 Q And has there always been an interest in 6 minimizing overtime to the extent possible? 7 A It's very dependent on the situation. 8 Q Okay. Can you give us a couple examples of when 9 overtime would be appropriate for an officer or 10 detective? 11 A Certainly felony investigations, we have a 12 variety of grants that we have to expend where 13 overtime is part of that, unexpected incidents, 14 completing reports for a case or presentation to 15 the D.A. if it's an arrest situation. 16 There's a lot of time constraints in 17 our business, and we have to get things done, and 18 sometimes it requires working beyond the 19 eight-hour shift. 20 Q Okay. Going back to January 1st of 2015, was 21 that part of your stint as Acting Captain or had 22 you become Captain already? 23 A Was what part of my stint? 24 Q Strike that. On January 1st of 2015 you were 25 Acting Captain in the Investigations Division,</p>	<p style="text-align: right;">Page 24</p> <p>1 Brunson from Thomas Hines, and it bears your 2 signature on Page 5; is that correct? 3 A I want to make sure I'm looking at the right one. 4 Q Yes, right there. 5 A Okay. Yes. 6 Q Do you recall sending this memo? 7 A I do. 8 Q Why does it indicate that it's from Thomas Hines, 9 Police Sergeant? 10 A In Internal Affairs the sergeant's role is to 11 conduct the investigations and quite frankly 12 interact with members when it comes to personnel 13 investigations. The information here in the body 14 of this report is conveyed to me, and quite 15 frankly this is authored by me, and I think what 16 I overlooked is that that "from" wasn't changed. 17 We do many of these reports and -- 18 Q Right. 19 A -- looking at this one on the front, it's 20 possible that that "from" title just wasn't 21 changed. But that is my signature. 22 Q Okay. Do you recall this particular incident 23 that's contained in Exhibit 1? 24 A I only recall what Lieutenant Turcinovic had sent 25 up, which is indicated in that memorandum that he</p>
<p style="text-align: right;">Page 23</p> <p>1 right? 2 A Yes. 3 Q Okay. Do you recall sending Ms. Lewandowski home 4 that night before she had a chance to complete a 5 report that she was doing? 6 A No. 7 Q Okay. Ms. Lewandowski claims as part of her 8 lawsuit that you sent her home without completing 9 the report that evening and then reprimanded her 10 for not having completed the report the night 11 before. 12 A And what's your question? 13 Q My question is, do you recall any incident like 14 that? 15 A No. 16 Q Okay. Do you recall telling Ms. Lewandowski that 17 that's what happens when you go against me? 18 A No. 19 Q Okay. I'm going to show you what we marked as 20 Exhibit 1 to your Deposition. Could you review 21 that briefly? 22 A Okay. 23 Q All right. I want to refer your attention 24 specifically to Pages 4 and 5 of the exhibit. 25 It's your April 7, 2014, two-page memo to Michael</p>	<p style="text-align: right;">Page 25</p> <p>1 forwarded through Captain Stigler. As far as the 2 rest of that process, I wouldn't have been 3 involved in it. 4 Q Do you recall speaking to Detective Lewandowski 5 about the information contained in Exhibit 1? 6 A No. 7 Q Do you know who Melanie Beasley is? 8 A I know the name. 9 Q Okay. Do you know what her current status is 10 with the department? 11 A I don't. 12 Q Did you ever supervise Ms. Beasley directly or 13 indirectly? 14 A I don't believe so. 15 Q Okay. Do you recall Shannon Lewandowski 16 testifying in a hearing on a temporary 17 restraining order Ms. Beasley was bringing 18 against Robert Wilkinson? 19 A I don't have any knowledge of that. 20 Q Okay. Have you ever gone through early 21 intervention training at the department? 22 A Oh, yes. I don't know if it was called that, but 23 we've received training as supervisors on that 24 topic, yes. 25 Q Okay. Can you briefly in a sentence or two</p>

Page 26

1 describe what that training consists of?

2 **A The training that I received was specific to**

3 **monitoring officers that are outliers as far as**

4 **use of force, pursuits, citizen complaints. That**

5 **was the type of training that I received.**

6 Q Okay. Does the department also offer training in

7 assisting officers who may be having personal

8 issues?

9 **A I don't know if I would call it training. I know**

10 **that we are all aware of the resources available**

11 **and how to convey that information to those that**

12 **we either identify would benefit or people that**

13 **actually request it.**

14 Q Do the policies of the department allow for

15 officers to assist other officers with personal

16 matters if it's affecting their work?

17 **A I don't know if that's noted in the policies. Do**

18 **you mean like being friends with people?**

19 Q No. What I'm asking about is if you notice that

20 another member of the department is having a

21 personal issue that's affecting their work, is

22 there anything that provides for you to have the

23 ability to assist that officer and still have it

24 be considered police business?

25 **A We have a police officer support team that**

Page 27

1 **handles that. It's called the POST team.**

2 Q And briefly, what does the POST team do?

3 **A I only know from a 10,000 foot level. It's a**

4 **group of members of a variety of ranks that do**

5 **respond to those types of requests, people that**

6 **need help with a personal matter, financial**

7 **matter, work matter, I think a variety of things.**

8 **But it's a confidential exchange with members of**

9 **that team and the member.**

10 Q Okay. Did you ever attend any injunction hearing

11 or TRO hearing brought by Ms. Beasley?

12 **A No.**

13 Q Did you ever send someone else to attend a

14 hearing like that?

15 MR. PEDERSON: I'm going to interject

16 here. Are you saying for any member or

17 specifically as to Ms. Beasley?

18 BY MS. HEINS:

19 Q Specifically as to Ms. Beasley.

20 **A I don't think so, no.**

21 Q Okay. At some point in January of 2015

22 Ms. Lewandowski was involved in an accident in a

23 police squad, correct?

24 **A Yes.**

25 Q How did you first become aware of that?

Page 28

1 **A I believe it was a phone call from one of the**

2 **Lieutenants, and I am not exactly sure which one.**

3 Q Was it Lieutenant Hanley?

4 **A It's possible. I did get a call from a**

5 **Lieutenant. Again, I just don't know which one.**

6 Q And do you recall generally the substance of the

7 call?

8 **A That there was a severe accident with injuries to**

9 **civilian and police personnel, Shannon and her**

10 **partner Juanita Carr, Detective Juanita Carr,**

11 **and, like I said, a civilian. And that was**

12 **really it, and that it was being handled.**

13 Q Did the call indicate that the accident had

14 happened recently?

15 **A I got the call I believe as soon as the**

16 **supervisor was available to tell me. I don't**

17 **remember the time gap.**

18 Q Were you on duty at the time?

19 **A I was home.**

20 Q Okay.

21 **A It was at night.**

22 Q Right. And at that time what were your work

23 hours at the department usually?

24 **A Well, I was a day shift Lieutenant so, 7:00 a.m.**

25 **to three or 8:00 a.m. to four, business hours.**

Page 29

1 Q Okay. Did you -- after you received the call

2 from the Lieutenant describing the accident, did

3 you take any further steps with regard to that

4 accident right away?

5 **A I don't recall. But knowing myself, I would have**

6 **called my boss to tell him.**

7 Q And who was your boss at the time?

8 **A Assistant Chief Kurt Leibold.**

9 Q Okay. Do you recall anything that he did after

10 being informed by you?

11 **A I wouldn't know what he did. I can only assume.**

12 Q Okay. Any accident that happens involving

13 members of the department is considered serious,

14 right?

15 **A No.**

16 Q Let me back up a second. Is it of particular

17 note to officers when fellow officers have been

18 involved in an accident with injuries?

19 **A Can you rephrase it? I don't think I understand**

20 **your question.**

21 Q When you hear that another officer has been

22 involved in an accident and has been injured,

23 does that hit you personally in any way?

24 **A Are you made aware of it, are you concerned? Is**

25 **that the question?**

Page 30

1 Q Yes, essentially.
2 **A Absolutely.**
3 Q And if fellow officers are injured, that's
4 something that's of interest to all the members
5 of the department in one way or another, right?
6 **A I can only speak for myself.**
7 Q All right. For you, is that something of
8 interest to you?
9 **A When someone's seriously hurt?**
10 Q Yes.
11 **A Yes.**
12 Q Why?
13 **A It's an unfortunate part of the task that we**
14 **perform every day, and nobody wants to hear about**
15 **that.**
16 Q Okay. When you learned about the accident, did
17 you direct anybody under your supervision to take
18 any steps to investigate it?
19 **A I don't recall that, but the policy is that a**
20 **supervisor will investigate all accidents. And**
21 **in the situation here, which was a severe**
22 **accident from what I was explained to, I believe**
23 **the supervisors were already there.**
24 Q Okay. And who would have been considered
25 Ms. Lewandowski's direct supervisor at that time?

Page 31

1 **A Quite frankly, any one of supervisory rank at the**
2 **scene, you know, she's subordinate to. But the**
3 **working Lieutenant in the bureau would have been**
4 **the person that would have called me.**
5 Q Okay. And so someone with the rank of Lieutenant
6 would have been her supervisor, right, or
7 immediate supervisor?
8 **A As far as her reporting chain of command through**
9 **her bureau, yes. But again if there's a Sergeant**
10 **there, a Sergeant also can oversee that.**
11 Q Okay. As a result of the accident on January 19,
12 2015, was Ms. Lewandowski off work for a period
13 of time?
14 **A Yes.**
15 Q And why was she off work?
16 **A She had injuries from the accident.**
17 Q What were her injuries?
18 **A I don't know specifically.**
19 Q One of the injuries Ms. Lewandowski sustained was
20 a concussion, right?
21 MR. RETTKO: If you know.
22 THE WITNESS: I don't know.
23 BY MS. HEINS:
24 Q You don't know? Did you ever go to visit
25 Ms. Lewandowski at her home after the accident?

Page 32

1 **A Yes.**
2 Q Okay. And what was your purpose in doing that?
3 **A Captain Jason Smith and I went to her residence.**
4 **I believe it was to either check on her status or**
5 **convey some paperwork. I don't recall exactly**
6 **why we went.**
7 Q How long after the accident did the two of you go
8 there?
9 **A Well, she was still injured and not at work. So**
10 **I don't remember the day. I remember it was**
11 **cold.**
12 Q Okay.
13 **A And there was snow.**
14 Q Was this a few days after the accident or was it
15 a longer period of time than that?
16 **A I don't recall.**
17 Q You don't recall? Was there ever any other
18 occasion when you went to Ms. Lewandowski's home
19 after the accident?
20 **A Absolutely not.**
21 Q No? Within a week or two after the accident did
22 you verbally reprimand Ms. Lewandowski for
23 testifying on behalf of Ms. Beasley?
24 **A Absolutely not.**
25 Q Why do you say, absolutely not?

Page 33

1 **A I don't know about that until you just mentioned**
2 **it.**
3 Q Okay. Going back to the accident, you described,
4 you indicated that Detective Lewandowski and
5 Detective Carr were in the accident together,
6 right?
7 **A Yes.**
8 Q Was Detective Carr injured as well?
9 **A Yes.**
10 Q Did she also have severe injuries?
11 **A I don't know.**
12 Q Was she off work for a period of time?
13 **A I think so. I don't remember.**
14 Q Okay. Did Ms. Lewandowski try to return to work
15 after the accident within a month or two?
16 **A I think she did return to work.**
17 Q Okay. During the time she was off work because
18 of the accident, was she also required to testify
19 in cases that she had helped investigate?
20 **A Can you rephrase the question?**
21 Q Sure. While she was off work for the injuries
22 from the accident, was she also required to
23 testify under subpoena at any court hearings in
24 cases she had worked on as a detective?
25 **A I believe she received subpoenas from -- related**

<p style="text-align: right;">Page 34</p> <p>1 to her duties. The rule on being able to testify</p> <p>2 on those are -- when you're hurt, deals with how</p> <p>3 mobile are you, if you can get there or not.</p> <p>4 Q Okay. And does being subpoenaed to testify</p> <p>5 depend on what off-duty status you are in at the</p> <p>6 time?</p> <p>7 A Do you mean do you not get a subpoena if you're</p> <p>8 injured? I don't understand the question.</p> <p>9 Q Let's start with that. Do you not get a subpoena</p> <p>10 to testify if you're out injured?</p> <p>11 A You do get subpoenas, orders from the court.</p> <p>12 Q Okay. And so I believe you mentioned a moment</p> <p>13 ago that the question of whether you would go or</p> <p>14 not relates to whether you can get there?</p> <p>15 A I said based upon someone's mobility that's</p> <p>16 related to their injury.</p> <p>17 Q Right. So if they're not mobile because of the</p> <p>18 injury, they would not be forced to testify?</p> <p>19 A What do you mean by forced?</p> <p>20 Q Subpoenaed, legally forced, compelled.</p> <p>21 A Well, I think the subpoena comes no matter what.</p> <p>22 The person issuing the subpoena doesn't know if</p> <p>23 someone's hurt or not.</p> <p>24 Q Okay. So if someone's hurt and not mobile, how</p> <p>25 would they go about getting out of a subpoena to</p>	<p style="text-align: right;">Page 36</p> <p>1 which an officer can be injured and not at work</p> <p>2 and not being paid?</p> <p>3 A Injured, not at work, and not being paid.</p> <p>4 Q Right.</p> <p>5 A I don't know.</p> <p>6 Q Okay. Do you know if Detective Lewandowski</p> <p>7 received pay while she was off work with her</p> <p>8 injuries?</p> <p>9 A If she was on an IOD status, she would be getting</p> <p>10 paid because that is a specific code for payroll.</p> <p>11 Q And if she were not on IOD status, would she be</p> <p>12 getting paid?</p> <p>13 A That's dependent on a lot of factors, you know,</p> <p>14 sick time and comp time and vacation time. I</p> <p>15 don't know the details of her balances in those</p> <p>16 areas.</p> <p>17 Q Okay. Do you recall her calling you a couple of</p> <p>18 months after she had been off work to inquire</p> <p>19 about her status being off work?</p> <p>20 A Call me about her status?</p> <p>21 Q Whether she was on IOD or FMLA?</p> <p>22 A I don't recall a specific conversation about</p> <p>23 that, no.</p> <p>24 Q Okay. In any of your conversations with</p> <p>25 Detective Lewandowski after her accident in</p>
<p style="text-align: right;">Page 35</p> <p>1 testify?</p> <p>2 A There's an adjournment request form that is</p> <p>3 filled out for a variety of reasons, and if</p> <p>4 you're not available, if you're injured, if</p> <p>5 you're on vacation. That goes through your chain</p> <p>6 of command, and it's pushed to the court</p> <p>7 administration section, and they make their</p> <p>8 arrangements. It's not always granted.</p> <p>9 Q All right. But there is a mechanism to request</p> <p>10 being excused from a subpoena if you're not able</p> <p>11 to attend because of injuries.</p> <p>12 A There's a mechanism to request not being able to</p> <p>13 attend a state or a municipal subpoena for a</p> <p>14 variety of reasons.</p> <p>15 Q Okay. At the department what is injured on duty</p> <p>16 status?</p> <p>17 A If you received an injury related to an on-duty</p> <p>18 action.</p> <p>19 Q Okay. And does injured on duty status come with</p> <p>20 pay or without pay?</p> <p>21 A No. You are paid while you are injured.</p> <p>22 Q Okay. If someone is injured and off duty and on</p> <p>23 FMLA, is that paid or unpaid?</p> <p>24 A I'm not an FMLA expert. I don't know.</p> <p>25 Q Okay. Are there occasions or circumstances under</p>	<p style="text-align: right;">Page 37</p> <p>1 January, 2015, did you observe that she had</p> <p>2 problems speaking to you or interacting with you</p> <p>3 in any way?</p> <p>4 A I believe there came a time -- it wasn't a</p> <p>5 problem with speaking or interacting. It was she</p> <p>6 had conveyed some issues -- and I don't recall</p> <p>7 specifics -- about not being healthy. That would</p> <p>8 have been in a setting with another supervisor.</p> <p>9 I don't recall specifics, but it was in my office</p> <p>10 and she -- it was something to do with either</p> <p>11 serving a discipline that had come down or giving</p> <p>12 her some kind of documentation, but I don't</p> <p>13 remember the exact details.</p> <p>14 Q Okay. Did you suspend her from work at some</p> <p>15 point after her accident after she had returned?</p> <p>16 A I believe so.</p> <p>17 Q And for what reason?</p> <p>18 A I don't recall the exact reason. It would have</p> <p>19 been an order that came from my boss, because I</p> <p>20 didn't have that authority.</p> <p>21 Q Okay. But you would be the one to advise her</p> <p>22 that she was being suspended?</p> <p>23 A Correct.</p> <p>24 Q Okay. Do you recall if Detective Carr returned</p> <p>25 to work after the accident?</p>

Page 38	Page 40
<p>1 A Yes, I know for a fact she did. She's still 2 working. 3 Q Is she? Okay. Did you ever become aware that 4 Ms. Lewandowski was having trouble testifying in 5 court under subpoena after her accident? 6 A I don't believe so. 7 Q Did you ever observe Ms. Lewandowski stutter when 8 she spoke after the accident? 9 A I don't think so. 10 Q Do you recall an incident where Ms. Lewandowski 11 was accused of being drunk while testifying at 12 court? 13 A I don't. 14 Q Okay. Do you recall which of the detectives was 15 driving the car at the time of the accident? 16 A I don't. I think it was Shannon. 17 Q Okay. Was there ever a determination that she 18 had been the cause of the accident? 19 A I wasn't part of that investigation. I don't 20 know what the details of it were. 21 Q Okay. Do you recall that -- do you recall any 22 details about the accident? 23 A Yes. 24 Q What do you recall? 25 A That she and her partner had been dispatched by a</p>	<p>1 Q Okay. 2 A I mean, if you can be more specific, I might be 3 able to help you on that. 4 Q You mentioned just a couple minutes ago that you 5 recall Ms. Lewandowski being in your office with 6 another person from command staff, and you were 7 talking about paperwork or something. Do you 8 remember that? 9 A Yes. 10 Q Was that Lieutenant Armbruster? 11 A It could have been Lieutenant Armbruster, it 12 could have been Lieutenant Berard. I'm just 13 trying to think who worked day shift hours. It 14 could have been Lieutenant Lough. Exactly who, I 15 don't know. 16 Q All right. At some point after the accident, did 17 you take away Ms. Lewandowski's police powers, 18 her gun, her badge, that sort of thing? 19 A Well, that again if you're referring to a 20 suspension, if she was suspended, I believe she 21 was. 22 Q Okay. Do you recall what led to the suspension? 23 Was there a particular incident? 24 A I know there were a few different incidents 25 involving the rationale why that was -- order was</p>
Page 39	Page 41
<p>1 supervisor to do some follow-up on a case, and 2 that was in proximity to the district, it would 3 have been in a north or west direction. And then 4 some accident occurred after that instruction 5 east of the district, and that was contrary to 6 what the supervisor had told her. That's really 7 the extent of what I knew about how the accident 8 occurred. 9 Q Do you recall anything about the other driver in 10 the accident? 11 A I believe it was a female driver, and that the 12 accident was significant. I don't know. I 13 didn't get -- recall her name or anything about 14 her. 15 Q Okay. After the accident did you ever reassign 16 Ms. Lewandowski to a different position? 17 A Well, assignments are only at the authority of 18 the Chief. Do you mean like a transfer? 19 Q Transfer or recommend reassigning? 20 A Well, I would have had the authority to reassign 21 her within my bureau to a different task. I'm 22 just trying to think back. I don't remember 23 because there was -- we did a lot of things in 24 the division, and a lot of detectives performed a 25 lot of different tasks.</p>	<p>1 pushed down to me. Most of -- what I recall more 2 specifically was after I was notified by a 3 Children's Court Center judge of some conduct she 4 had been engaged in. 5 Q Was that Judge Swanson? 6 A Perhaps. A male Children's Court Center judge. 7 Q Okay. Do you recall specifically what 8 information you received from that judge? 9 A Well, I documented the information I received. 10 What I recall is that he had contacted me 11 directly, which was very -- highly unusual to be 12 called by a judge, and reported essentially what 13 was misconduct on her behalf while in his 14 courtroom. 15 Q Okay. You mentioned that you thought there were 16 a few incidents that led to her suspension. What 17 were the other ones? 18 A I recall that one, and then I thought there was 19 another instance where she was suspended but it 20 could -- the interactions kind of run together. 21 I know with certainty she was suspended at least 22 once. I know that I was in order to serve that 23 paperwork on her. And maybe it wasn't twice, but 24 I do know at least once, or of my once. 25 Q Okay. Do you recall if there were any other</p>

<p style="text-align: right;">Page 42</p> <p>1 incidents involving Detective Lewandowski's 2 testimony in court? 3 A I don't understand the question. 4 Q You mentioned you thought there were a few 5 incidents that led to her suspension. Would one 6 of those, one or more of those instances have 7 related to other court appearances where she was 8 testifying? 9 A Well, to clarify, I don't know if these incidents 10 compounded into a suspension. I know that the 11 one incident about the misconduct in court, I 12 referred that for investigation. I don't know 13 what the outcome of that was. But I also 14 recall -- and I don't know if it was a result of 15 that or if it was prior -- but I do recall being 16 given the order to suspend her. So it could have 17 been from the court incident or it might have 18 been prior. 19 Q Okay. 20 A I don't remember. And as far as her testimony in 21 court, I never have witnessed that. I've never 22 been in court when she's testifying, so. 23 MR. PEDERSON: For the record, I 24 would like to make something clear. You were 25 told that you were suspending her. Are you</p>	<p style="text-align: right;">Page 44</p> <p>1 suspensions for department members, either the 2 suspension of police powers or a suspension, 3 meaning sending someone home from work? 4 A There's a variety of different -- when you talk 5 about suspensions, you can be administratively 6 suspended, you can be completely suspended where 7 you are not even allowed to show up on the 8 property. So there's a distinction there. 9 Q Okay. What's administratively suspended mean? 10 A If your police powers are suspended; however, you 11 can still perhaps file paperwork or you can 12 answer a phone call. You can perform 13 police-related duties that are not field 14 operations, if you will. 15 Q Okay. 16 A Arrest-related type situations. 17 Q So a member of the department then could be 18 administratively suspended but still working for 19 the department performing other job duties, 20 right, like you said paperwork or -- 21 A Yes. 22 Q Not involving field work. 23 A Correct. 24 Q Was Ms. Lewandowski ever on one of those type of 25 suspensions under your supervision?</p>
<p style="text-align: right;">Page 43</p> <p>1 talking about suspending as discipline or 2 suspending of police powers. 3 THE WITNESS: Well, a suspension -- I 4 can't impose discipline to that level. So that 5 would have been an order simply to suspend her 6 police powers. 7 MR. PEDERSON: Okay. 8 THE WITNESS: Which involves taking a 9 member's equipment and informing them that, you 10 know, they don't have arrest authority. 11 BY MS. HEINS: 12 Q Okay. A person whose police powers have been 13 suspended, can that person still testify in court 14 under a subpoena? 15 A When a person's on suspension? 16 Q Yes. 17 A You have to honor a subpoena. 18 Q Okay. So, yes. 19 A Yes, if you get subpoenaed, you have to honor it. 20 Q Okay. So having your police powers suspended 21 does not mean that you can't testify in court, is 22 what I'm asking? 23 A Yes. 24 Q So would it be fair to say then based on 25 counsel's question, that there are two types of</p>	<p style="text-align: right;">Page 45</p> <p>1 A I don't remember. 2 Q Okay. Was she ever suspended and sent home from 3 work completely under your supervision? 4 A What do you mean, sent home from work completely? 5 I don't understand. 6 Q The other type of suspension. 7 A I don't know if that did happen or not. That 8 would not have been something that was up to me. 9 That would have to be something I received an 10 order for. 11 Q All right. Let me back up to try to clarify 12 this. You spoke about there were some incidents 13 that led up to Detective Lewandowski being 14 suspended. Was that suspension administrative or 15 nonadministrative? 16 A I recall her equipment was taken, her firearm. 17 We normally also take the credentials away. But 18 I don't recall the specifics if she was fully 19 suspended or administratively. I make the 20 assumption it was administrative. She would have 21 kept her identification so she could get back in 22 and out of the building. 23 Q Okay. 24 A But, again, to clarify, I don't know if it was a 25 variety of different incidents that led to a</p>

Page 46

1 **suspension or if it was based upon one. I -- I**
2 **didn't work in the Internal Affairs Division**
3 **then, so I don't know if she had other issues**
4 **going on or not.**
5 Q So was it up to people in the Internal Affairs
6 Division to determine whether a member should be
7 suspended in any fashion?
8 A **Well, any Captain on the police department has**
9 **that ability. But when it comes to a full**
10 **suspension, that comes from the Commander of**
11 **Internal Affairs or an Assistant Chief or**
12 **Inspector.**
13 Q Okay. You mentioned in speaking about the judge
14 from Children's Court incident, that you referred
15 that for investigation. Did you refer that to
16 Internal Affairs?
17 A **Through my chain of command, yes.**
18 MS. HEINS: Why don't we take a short
19 break here.
20 (A recess was taken.)
21 BY MS. HEINS
22 Q After you received the call from Judge Swanson,
23 did you speak to Detective Lewandowski shortly
24 after that?
25 A **No.**

Page 47

1 Q You're certain of that?
2 A **I think so, yes.**
3 Q Okay. Did you go to her home to talk to her
4 about it after receiving the call from Judge
5 Swanson, within a day or two?
6 A **If I went to her home, that would have been the**
7 **instance I went with Captain Smith. I only went**
8 **to her home once.**
9 Q Okay. Do you recall telling her that she was
10 making bad decisions?
11 A **I don't recall that.**
12 Q Did you tell her that; you had a cell phone in
13 court and the judge called me and told me he
14 wanted to hold you in contempt of court and
15 decided not to as a favor?
16 A **I don't recall saying that to her, no.**
17 Q Do you recall telling Detective Lewandowski that;
18 you called a burglary suspect the N-word?
19 A **I don't recall saying that, no.**
20 Q Do you recall an incident where Detective
21 Lewandowski apprehended an attempted burglar at
22 her own home while she was off work after the
23 accident?
24 A **I do vaguely recall that, yes.**
25 Q When you went to Detective Lewandowski's home,

Page 48

1 was that the occasion that you suspended her
2 police powers?
3 A **No. I believe that occurred in -- at the Police**
4 **Administration Building in my office.**
5 Q When you were at Detective Lewandowski's home did
6 you tell her that she could not take the
7 lieutenant's exam?
8 A **No.**
9 Q Did you tell her that she could not testify for
10 Melanie Beasley?
11 A **No.**
12 Q Do you recall an occasion in February, 2015,
13 where Detective Lewandowski went to court and did
14 testify on behalf of Melanie Beasley?
15 A **I have no knowledge of anything that has to do**
16 **with Melanie Beasley.**
17 Q Okay. Did you tell Detective Lewandowski that
18 she had violated the rules by testifying in court
19 for her while she was suspended?
20 A **No.**
21 Q Are aware that Detective Lewandowski sent a
22 letter to the court apologizing for the incident
23 that we've been referring to?
24 A **To the accident or the -- which incident?**
25 Q Let me try that again. Are you aware that

Page 49

1 Detective Lewandowski wrote a letter to the judge
2 in Children's Court apologizing for that
3 incident?
4 A **I'm not.**
5 Q Okay. Did you ever send a POST member to
6 Detective Lewandowski's home to speak to her?
7 A **I don't remember.**
8 Q Okay. Did you ever order Detective Lewandowski
9 to write a memo for an involuntary transfer or
10 face more consequences for her complaints?
11 A **No.**
12 Q Did you ever talk to Mike Crivello about
13 Detective Lewandowski?
14 A **At least once. I don't know how many times.**
15 Q Did you tell him that she made you look bad in
16 the eyes of the Big Guy, or the Chief?
17 A **No.**
18 Q Did you ever advise Detective Lewandowski that
19 she was not to testify in court even under
20 subpoena?
21 A **Absolutely not. I would never do that.**
22 Q Did Detective Lewandowski ever tell you that she
23 had headaches from her accident?
24 A **I don't remember, but it's possible.**
25 Q Okay. Did you ever cause Detective Lewandowski

Page 50

1 to be sent for a fit-for-duty examination after
2 her accident?
3 **A Those orders come from the medical section. It**
4 **would not have come from me.**
5 Q Do you know if she was ever given a
6 fitness-for-duty exam?
7 **A I don't know.**
8 Q Okay. Did you see any of the memos that
9 Detective Lewandowski gave to the Chief's office
10 and to the Fire and Police Commission complaining
11 about discrimination and retaliation against her?
12 **A No.**
13 Q Did you retaliate against Detective Lewandowski
14 for complaining?
15 **A Never.**
16 Q Do you think you treated her differently on the
17 basis of her gender?
18 **A No.**
19 Q Do you know that Detective Lewandowski has made
20 those allegations against you?
21 **A Which allegations?**
22 Q That you treated her differently because of her
23 gender and that you retaliated against her for
24 complaining?
25 **A I believe I'm aware of those two, yes.**

Page 51

1 Q I'm going to show you what we've marked as
2 Exhibit 3 to your deposition. Have you seen that
3 before?
4 **A Well, I signed it. So if I could read through**
5 **it, I'm going to say, yes.**
6 Q Sure. Take your time.
7 **A Okay.**
8 Q Have you seen Exhibit 3 before?
9 **A Yes.**
10 Q Did you take any action in response to receiving
11 this memo from Detective Lewandowski?
12 **A Yes.**
13 Q What action did you take?
14 **A First I forward -- as you say, I sent a copy to**
15 **the medical section that oversees all of her**
16 **concerns as far as medical leave, FMLA, workman's**
17 **comp. I also sent it to her Captain, Dave**
18 **Salazar, because she no longer worked for me at**
19 **that time.**
20 Q Okay.
21 **A And it also looks like I asked for a copy to go**
22 **in her file.**
23 Q Did you ask Captain Salazar to take any
24 particular action on Exhibit 3?
25 **A No. He doesn't require guidance on this.**

Page 52

1 **Medical section is the place for all of these**
2 **concerns to be addressed.**
3 Q Okay. And you and Captain Salazar were peers at
4 that point, both of you were Captains?
5 **A No. I was a Lieutenant, Acting Captain; he was a**
6 **Captain.**
7 Q Okay. So it would have been a couple of months
8 after the date of this memo that you actually
9 became a Captain, June or so -- or August? I'm
10 sorry.
11 **A Yeah, August. So a few months.**
12 Q All right. Now I'll have you take a look at
13 Exhibit 2 to your deposition.
14 And it looks like the last page of
15 this exhibit was inadvertently attached to this,
16 as it does not relate. So if you could just
17 remove that.
18 **A This one?**
19 Q Yes. Sorry about that.
20 Have you had a chance to look at
21 this?
22 **A Not in detail, but I'm familiar with the format**
23 **of an AIM Report.**
24 Q This report concerns the accident that we've been
25 referring to in January, 2015 that Detective

Page 53

1 Lewandowski was involved in?
2 **A Correct. This is the -- it's an administrative**
3 **report that the supervisor files that responds to**
4 **the scene of any particular incident.**
5 Q Okay. Did you author any of the information
6 that's contained in Exhibit 2?
7 **A Highly unlikely. This is done by a Sergeant or a**
8 **Lieutenant. No, this appears to be a narrative**
9 **from Lieutenant Hanley regarding the notes.**
10 **Yeah, that's -- all I would have done on this is**
11 **recommend it forward to Internal Affairs, which**
12 **all accidents go there.**
13 Q Okay. So all accidents involving department
14 squads go there?
15 **A Yes, all department accidents get reviewed by**
16 **Internal Affairs.**
17 Q Okay. And did you have to request that it be
18 reviewed or does that happen automatically?
19 **A That's an automatic.**
20 Q Okay. One more exhibit. Have you take a look at
21 Exhibit 4.
22 MS. HEINS: And this exhibit is
23 confidential, so we need to have this part of the
24 transcript marked confidential.
25 (pages 54-106 CONFIDENTIAL).

<p>A</p> <p>ability 26:23 46:9</p> <p>able 34:1 35:10 35:12 40:3</p> <p>absolutely 14:15 20:17,24 30:2 32:20,24,25 49:21</p> <p>accessible 18:8</p> <p>accident 3:4 27:22 28:8,13 29:2,4,12,18 29:22 30:16,22 31:11,16,25 32:7,14,19,21 33:3,5,15,18 33:22 36:25 37:15,25 38:5 38:8,15,18,22 39:4,7,10,12 39:15 40:16 47:23 48:24 49:23 50:2 52:24</p> <p>accidents 30:20 53:12,13,15</p> <p>accused 38:11</p> <p>acronym 7:13</p> <p>Acting 6:1 7:24 10:14 12:22 19:4 22:21,25 52:5</p> <p>action 35:18 51:10,13,24</p> <p>added 8:3</p> <p>addressed 52:2</p> <p>adjournment 35:2</p> <p>administration 10:5 35:7 48:4</p> <p>administrative 45:14,20 53:2</p> <p>administrativ... 44:5,9,18 45:19</p> <p>Admonish 21:15</p> <p>advise 37:21 49:18</p> <p>Affairs 5:22 7:6 8:10,18,25 9:5 14:5,6,17 15:4 24:10 46:2,5 46:11,16 53:11 53:16</p> <p>agencies 10:3</p> <p>agency 14:2</p>	<p>agents 7:18</p> <p>ages 12:11</p> <p>ago 20:25 34:13 40:4</p> <p>ahead 20:11</p> <p>AIM 52:23</p> <p>allegations 15:10 50:20,21</p> <p>allocated 22:3</p> <p>allow 26:14</p> <p>allowed 44:7</p> <p>allowing 20:3</p> <p>Amended 18:12</p> <p>answer 12:16 20:11 44:12</p> <p>Anthony 17:20</p> <p>anybody 30:17</p> <p>apologize 20:20</p> <p>apologizing 48:22 49:2</p> <p>appearances 42:7</p> <p>appeared 2:5,9 2:15</p> <p>appears 53:8</p> <p>apprehended 47:21</p> <p>approach 21:20</p> <p>appropriate 22:3 22:9</p> <p>approved 16:14</p> <p>April 23:25</p> <p>areas 7:13 36:16</p> <p>Armbruster 18:21 40:10,11</p> <p>arrangements 35:8</p> <p>arrest 17:7 18:24 22:15 43:10</p> <p>Arrest-related 44:16</p> <p>asked 51:21</p> <p>asking 6:22 16:7 26:19 43:22</p> <p>assigned 4:19,22 5:15,21,22 6:4 6:14,18 7:10 7:11,24 10:13 10:22,23,24 12:22 13:1</p> <p>assignment 7:8 7:9</p> <p>assignments 6:23 7:2 9:16 39:17</p> <p>assist 26:15,23</p>	<p>Assistant 2:14 6:5 17:18 29:8 46:11</p> <p>assisting 26:7</p> <p>assume 29:11</p> <p>assumes 20:9</p> <p>Assuming 19:18</p> <p>assumption 45:20</p> <p>attached 3:23 52:15</p> <p>attempted 47:21</p> <p>attempts 18:19</p> <p>attend 27:10,13 35:11,13</p> <p>attention 13:10 23:23</p> <p>Attorney 2:11 2:15 3:22</p> <p>Attorney's 15:1 15:8</p> <p>August 5:8,9 52:9,11</p> <p>author 53:5</p> <p>authored 24:15</p> <p>authority 37:20 39:17,20 43:10</p> <p>authorize 18:17 18:23</p> <p>automatic 53:19</p> <p>automatically 53:18</p> <p>available 26:10 28:16 35:4</p> <p>aware 14:21</p> <p>26:10 27:25 29:24 38:3 48:21,25 50:25</p> <p>a.m 1:20 28:24 28:25</p> <p>B</p> <p>B 3:1</p> <p>bachelor 11:18</p> <p>back 4:18 5:16 6:22 9:11 10:5 16:10 17:3 22:20 29:16 33:3 39:22 45:11,21</p> <p>background 12:15</p> <p>bad 47:10 49:15</p> <p>badge 40:18</p> <p>balances 36:15</p> <p>based 34:15 43:24 46:1</p>	<p>basis 50:17</p> <p>Bear 4:20</p> <p>bears 24:1</p> <p>Beasley 25:7,12 25:17 27:11,17 27:19 32:23 48:10,14,16</p> <p>beginning 21:19</p> <p>behalf 2:5,10,15 32:23 41:13 48:14</p> <p>believe 5:8,15 12:23 14:25 15:6 16:4 21:3 25:14 28:1,15 30:22 32:4 33:25 34:12 37:4,16 38:6 39:11 40:20 48:3 50:25</p> <p>benefit 26:12</p> <p>Berard 40:12</p> <p>best 13:15</p> <p>beyond 22:18</p> <p>Big 49:16</p> <p>bill@rettkola... 2:9</p> <p>body 24:13</p> <p>boss 21:10 29:6 29:7 37:19</p> <p>boy 4:20</p> <p>Bradley 17:21</p> <p>break 46:19</p> <p>brief 18:14</p> <p>briefly 23:21 25:25 27:2</p> <p>bringing 25:17</p> <p>Broadway 2:12</p> <p>Brookfield 2:8</p> <p>brought 27:11</p> <p>Brunson 24:1</p> <p>budgets 9:23</p> <p>building 2:12 7:16 10:5 45:22 48:4</p> <p>bureau 5:4 7:5 10:20,21,22 11:2 14:2 31:3 31:9 39:21</p> <p>burglar 47:21</p> <p>burglary 47:18</p> <p>business 11:9 22:17 26:24 28:25</p> <p>C</p> <p>C 2:1 4:1</p>	<p>call 26:9 28:1,4 28:7,13,15 29:1 36:20 44:12 46:22 47:4</p> <p>called 4:3 5:15 8:11 12:24 25:22 27:1 29:6 31:4 41:12 47:13,18</p> <p>calling 36:17</p> <p>capacity 6:8</p> <p>Capitol 2:8</p> <p>Captain 3:16 5:5 5:6 6:1,4 7:9 7:24 9:18 10:11,14 12:22 16:3 18:20 19:5 22:21,22 22:25 25:1 32:3 46:8 47:7 51:17,23 52:3 52:5,6,9</p> <p>Captains 52:4</p> <p>car 38:15</p> <p>career 20:23</p> <p>Carr 28:10,10 33:5,8 37:24</p> <p>case 1:6 3:3,7 4:14 17:23 18:11 22:14 39:1</p> <p>cases 33:19,24</p> <p>cause 38:18 49:25</p> <p>cell 47:12</p> <p>Center 41:3,6</p> <p>Central 12:24,24</p> <p>certain 47:1</p> <p>Certainly 22:11</p> <p>certainty 41:21</p> <p>Chad 6:4</p> <p>chain 17:13,16 19:21 20:2,4 21:1 31:8 35:5 46:17</p> <p>chance 23:4 52:20</p> <p>changed 24:16 24:21</p> <p>charge 6:7</p> <p>charged 22:2</p> <p>check 32:4</p> <p>Chief 6:6 14:13 17:6,9,18 18:21 19:10,13 19:20,23 29:8</p>
--	--	---	--	--

<p>39:18 46:11 49:16 Chiefs 50:9 children 12:7 Children's 41:3 41:6 46:14 49:2 chronological 6:24 CIB 4:19 5:7 9:18 10:19 12:25 circumstances 35:25 citizen 26:4 City 1:8 2:11,14 4:15 7:22 15:1 15:7 civilian 28:9,11 claims 23:7 clarification 16:3 clarify 21:14 42:9 45:11,24 clear 11:3 17:15 17:17 42:24 clearance 18:24 code 36:10 cold 32:11 colloquialism 17:25 come 6:3 14:7 14:14 15:19 16:17 35:19 37:11 50:3,4 comes 24:12 34:21 46:9,10 command 17:13 17:16 19:21 20:3,4 21:1 31:8 35:6 40:6 46:17 Commander 46:10 commanders 17:15 Commission 50:10 committed 17:25 18:25 comp 36:14 51:17 compelled 34:20 complaining 50:10,14,24 complaint 13:25 14:4,7,13</p>	<p>18:10,12 complaints 14:22 15:5,9 26:4 49:10 complete 23:4 completed 23:10 completely 44:6 45:3,4 completing 22:14 23:8 compounded 42:10 concerned 29:24 concerns 21:6 51:16 52:2,24 concussion 31:20 conduct 24:11 41:3 confident 13:22 confidential 3:7 3:10 27:8 53:23,24,25 consequences 49:10 considered 26:24 29:13 30:24 consists 26:1 constraints 22:16 contacted 41:10 contained 24:23 25:5 53:6 contempt 47:14 contrary 39:5 conversation 36:22 conversations 36:24 convey 26:11 32:5 conveyed 24:14 37:6 cop 17:25 18:25 copy 17:6 51:14 51:21 correct 24:2 27:23 37:23 44:23 53:2 counsel's 43:25 couple 11:20 22:8 36:17 40:4 52:7 court 1:1 33:23 34:11 35:6</p>	<p>38:5,12 41:3,6 42:2,7,11,17 42:21,22 43:13 43:21 46:14 47:13,14 48:13 48:18,22 49:2 49:19 courtroom 41:14 credentials 45:17 crimes 10:23,24 10:25 Criminal 5:4 7:5 10:20 11:1 Crivello 49:12 cross 19:15 20:7 20:16 current 5:3 25:9 currently 4:25 CV 1:6</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 2:18 4:1 date 52:8 dates 6:21 9:11 Dave 51:17 day 28:24 30:14 32:10 40:13 47:5 days 19:3 32:14 deals 34:2 December 18:16 decided 47:15 decisions 47:10 dedicated 13:23 Defendant 1:9 2:15 degree 11:10,12 11:16 denied 20:10 department 3:18 5:1,11,14 8:6 9:14,24 13:25 14:1,3 14:23 25:10,21 26:6,14,20 28:23 29:13 30:5 35:15 44:1,17,19 46:8 53:13,15 department's 21:20 depend 34:5 dependent 22:7 36:13 deposition 1:14</p>	<p>23:20 51:2 52:13 deputized 7:18 describe 9:17 13:2,15,20 14:11 26:1 described 33:3 describes 18:17 describing 29:2 description 3:2 21:22 designated 6:6 DESIGNATION 3:10 detail 13:10 52:22 details 15:3 18:14 36:15 37:13 38:20,22 detective 13:13 13:16 14:21 22:10 25:4 28:10 33:4,5,8 33:24 36:6,25 37:24 42:1 45:13 46:23 47:17,20,25 48:5,13,17,21 49:1,6,8,13,18 49:22,25 50:9 50:13,19 51:11 52:25 detectives 5:19 7:14 9:21 10:9 10:11,15,17,18 38:14 39:24 determination 38:17 determine 46:6 different 7:2 10:6,18 39:16 39:21,25 40:24 44:4 45:25 differently 50:16,22 direct 16:4,5 21:9 30:17,25 direction 39:3 directly 10:12 15:17 19:20 21:9 25:12 41:11 discipline 3:17 37:11 43:1,4 discriminated 14:23 discrimination</p>	<p>50:11 discussing 15:8 dispatched 38:25 distinction 44:8 district 1:1,2 6:19,21 7:3,3,7 7:8,10,17,24 7:25 8:1,2,22 8:23 9:8 39:2,5 districts 7:15,25 8:4 division 5:16 6:11 7:4,11,12 10:8 11:2 12:24 14:2,5,6 16:16 22:25 39:24 46:2,6 divisions 10:18 10:21 document 3:14 3:17 documentation 3:16 37:12 documented 15:24 16:1 41:9 documents 16:19 18:5 doing 15:15,18 19:6 23:5 32:2 door 17:9,11 Drive 2:8 driver 39:9,11 driving 38:15 Drug 7:12 drunk 14:14 38:11 duly 4:5 duties 5:10 9:17 10:6 34:1 44:13,19 duty 28:18 35:15,19,22 D.A 22:15</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 2:1,1,18 3:1 4:1,1 early 25:20 easily 12:5 east 39:5 EASTERN 1:2 easy 12:2 ECF 18:13 education 11:6 effect 19:8</p>
---	--	--	--	---

efforts 18:17 eight-hour 22:19 either 14:7 16:18 26:12 32:4 37:10 44:1 employed 4:25 Employee 3:7 EMPLOYMENT 2:2 engaged 41:4 entire 7:21,22 equipment 43:9 45:16 essentially 8:4 9:19 30:1 41:12 estimate 4:18 4:20 8:17 evaluation 16:23 evening 23:9 eventually 7:25 evidence 20:9 exact 6:20 9:11 37:13,18 exactly 6:23 28:2 32:5 40:14 exam 48:7 50:6 examination 2:20 4:7 50:1 examined 4:5 examples 22:8 exchange 27:8 excused 35:10 exhibit 3:2,3,4,5 3:7 23:20,24 24:23 25:5 51:2,8,24 52:13,15 53:6 53:20,21,22 exhibits 3:23 4:2 expected 17:12 21:11 expend 22:12 expert 35:24 explained 30:22 extent 22:6 39:7 extra 13:12 eyes 49:16 e-mail 17:6 19:4 19:6,19,23,25 21:1,9 e-mailed 18:19	e-mails 19:13 <hr/> F face 49:10 fact 7:17 11:19 20:9 38:1 factors 36:13 fair 43:24 fairly 9:13 familiar 19:1 52:22 far 5:24 7:21 9:12 25:1 26:3 31:8 42:20 51:16 fashion 46:7 favor 47:15 February 1:19 48:12 federal 7:18 10:3 fellow 29:17 30:3 felony 22:11 female 39:11 field 44:13,22 file 3:7 44:11 51:22 filed 14:22 15:2 15:5 files 53:3 filled 35:3 financial 27:6 find 18:15 fine 7:1 Fire 50:10 firearm 45:16 first 4:5 27:25 51:14 fitness-for-duty 50:6 fit-for-duty 50:1 Floor 2:13 Flynn 14:14 17:7,9 18:21 19:20 FMLA 35:23,24 36:21 51:16 follows 4:6 follow-up 15:13 39:1 foot 27:3 force 8:24 26:4 forced 34:18,19 34:20 form 35:2 format 52:22	forward 51:14 53:11 forwarded 25:1 four 28:25 Frank 2:11 frankly 7:20 24:11,15 31:1 friend 12:4 friends 26:18 front 24:19 full 46:9 fully 45:18 further 29:3 <hr/> G G 4:1 gap 28:17 gender 50:17,23 general 21:22 generally 13:24 28:6 getting 12:14 18:22 34:25 36:9,12 give 4:9,13 6:9 21:22 22:8 given 42:16 50:5 giving 37:11 Glen 2:3 go 4:24 6:22 16:10 17:3,13 20:11 21:8 23:17 31:24 32:7 34:13,25 47:3 51:21 53:12,14 goes 13:11 35:5 going 9:8,11 19:20 20:8 22:20 23:19 27:15 33:3 46:4 51:1,5 good 4:9 11:14 graduate 11:7 granted 35:8 grants 22:12 group 27:4 guessing 4:22 5:23 guidance 51:25 gun 40:18 Guy 49:16 <hr/> H H 3:1 hallway 19:5 handled 28:12	handles 27:1 Hanley 18:20 28:3 53:9 happen 45:7 53:18 happened 28:14 happens 23:17 29:12 hard 5:21,24 9:11 13:10 hard-working 13:13 headaches 49:23 healthy 37:7 hear 14:19 29:21 30:14 heard 17:10 hearing 25:16 27:10,11,14 hearings 33:23 Heins 2:2,4,22 2:24 3:22 4:8 12:14,18 16:6 16:9,11 20:14 27:18 31:23 43:11 46:18,21 53:22 hell 19:9 help 27:6 40:3 helped 33:19 helps 17:23 HIDTA 7:13 9:25 High 7:12 highest 11:5,10 highly 41:11 53:7 Hines 24:1,8 hit 14:14 29:23 hold 5:20 47:14 home 23:3,8 28:19 31:25 32:18 44:3 45:2,4 47:3,6,8 47:22,25 48:5 49:6 homicide 10:23 honor 43:17,19 hours 28:23,25 40:13 house 14:14 hurt 30:9 34:2 34:23,24 <hr/> I IAD 3:3 identification	45:21 identify 26:12 ID'D 3:2 immediate 21:6 31:7 Immediately 5:12 impose 43:4 inadvertently 52:15 incident 18:3 23:13 24:22 38:10 40:23 42:11,17 46:14 47:20 48:22,24 49:3 53:4 incidents 22:13 40:24 41:16 42:1,5,9 45:12 45:25 included 15:9 independent 13:22 indicate 21:16 24:8 28:13 indicated 16:20 24:25 33:4 indicates 18:18 19:3 indicating 18:22 indirect 16:13 indirectly 25:13 individual 17:24 individuals 19:22 20:2 informant 18:15 information 12:15 24:13 25:5 26:11 41:8,9 53:5 informed 29:10 informing 43:9 initially 6:19 8:2 8:6 initiative 9:25 injunction 27:10 injured 29:22 30:3 32:9 33:8 34:8,10 35:4 35:15,19,21,22 36:1,3 injuries 28:8 29:18 31:16,17 31:19 33:10,21 35:11 36:8 injury 34:16,18
---	---	---	--	--

<p>35:17 inquire 36:18 Inspector 46:12 instance 41:19 47:7 instances 42:6 instruction 39:4 Intelligence 7:4 Intensity 7:12 interact 24:12 interacting 37:2 37:5 interactions 41:20 interest 22:5 30:4,8 interested 7:1 interject 27:15 Internal 5:22 7:6 8:10,18,25 9:4 14:5,6,17 15:4 24:10 46:2,5,11,16 53:11,16 intervening 20:2 intervention 25:21 investigate 30:18,20 33:19 investigates 14:3 investigation 5:4 7:5 10:20 11:2 38:19 42:12 46:15 investigations 5:16 6:11 10:8 22:11,25 24:11 24:13 involuntary 49:9 involved 25:3 27:22 29:18,22 53:1 involves 43:8 involving 29:12 40:25 42:1 44:22 53:13 IOD 36:9,11,21 IOD/FMLA 3:5 issue 16:20 26:21 issued 3:18 issues 15:21 26:8 37:6 46:3 issuing 34:22</p>	<p>J JANET 2:4 January 22:20 22:24 27:21 31:11 37:1 52:25 Jason 32:3 jheins@heinsl... 2:5 job 12:23 44:19 Johnny 1:15 2:21 4:3,11 Juanita 28:10 28:10 judge 41:3,5,6,8 41:12 46:13,22 47:4,13 49:1 June 52:9 jurisdiction 7:19,22 J-O-H-N-N-Y 4:11</p> <p>K KAPARIS 1:24 kept 45:21 kind 5:24 16:20 37:12 41:20 knew 39:7 know 5:21 6:23 6:24 12:3 13:8 13:16 15:1,3 18:8 25:7,8,9 25:22 26:9,9 26:17 27:3 28:5 29:11 31:2,18,21,22 31:24 33:1,11 34:22 35:24 36:5,6,13,15 38:1,20 39:12 40:15,24 41:21 41:22,24 42:9 42:10,12,14 43:10 45:7,24 46:3 49:14 50:5,7,19 knowing 29:5 knowledge 25:19 48:15 known 4:17 8:24 12:19 Kurt 6:6 29:8</p> <p>L L 2:4</p>	<p>Lane 2:3 LAW 2:2,7 lawsuit 18:5 23:8 layers 21:5 leadership 11:9 learned 30:16 leave 51:16 led 40:22 41:16 42:5 45:13,25 legally 34:20 Leibold 6:6 29:8 letter 48:22 49:1 let's 4:24 34:9 level 11:5 21:8 27:3 43:4 levels 16:9 Lewandowski 1:4 3:5 4:14,17 12:20 13:3 14:8,13,22 15:16 16:12,21 18:14 19:19 20:16,19,22 21:13 23:3,7 23:16 25:4,15 27:22 31:12,19 31:25 32:22 33:4,14 36:6 36:25 38:4,7 38:10 39:16 40:5 44:24 45:13 46:23 47:17,21 48:13 48:17,21 49:1 49:8,13,18,22 49:25 50:9,13 50:19 51:11 53:1 Lewandowski's 15:22 30:25 32:18 40:17 42:1 47:25 48:5 49:6 liaison 10:3 lieutenant 5:14 6:5,10,12 7:7 7:23 8:14 9:9 9:22 10:7 18:20,20,21 24:24 28:3,5 28:24 29:2 31:3,5 40:10 40:11,12,14 52:5 53:8,9 Lieutenants 28:2</p>	<p>lieutenant's 15:19 48:7 life 20:18 line 3:15 LLC 2:2 long 4:17 5:6,20 6:8,16 8:10 11:23 12:6 32:7 longer 32:15 51:18 look 49:15 52:12 52:20 53:20 looking 24:3,19 looks 51:21 52:14 lot 10:25 22:16 36:13 39:23,24 39:25 Lough 18:20 40:14 lucky 9:15</p> <p>M making 22:2 47:10 male 41:6 manage 9:23 Management 3:3 March 8:7,9 marked 4:2 23:19 51:1 53:24 Marquette 11:7 11:19 married 11:21 12:4,6 master's 11:12 math 11:14 12:5 matter 27:6,7,7 34:21 matters 26:16 MBA 11:13 mean 15:24 17:12 26:18 34:7,19 39:18 40:2 43:21 44:9 45:4 meaning 44:3 mechanism 35:9 35:12 medical 50:3 51:15,16 52:1 Melanie 25:7 48:10,14,16 member 13:24</p>	<p>14:1 26:20 27:9,16 44:17 46:6 49:5 members 10:22 10:23,24 24:12 27:4,8 29:13 30:4 44:1 member's 43:9 memo 3:5 23:25 24:6 49:9 51:11 52:8 memorandum 24:25 memorandums 9:25 memos 50:8 mentioned 10:7 15:7 16:13 20:25 33:1 34:12 40:4 41:15 42:4 46:13 Mequon 1:19 2:3 Michael 23:25 Midwest 7:20 Mike 49:12 mile 13:12 Milwaukee 1:8 2:13 4:15,25 5:10,14 7:22 8:5 9:24 11:17 minimizing 22:6 minutes 40:4 misconduct 41:13 42:11 mobile 34:3,17 34:24 mobility 34:15 moment 20:25 34:12 monitoring 22:2 26:3 month 33:15 months 6:9 36:18 52:7,11 morning 4:9 MPD 10:12 municipal 2:12 35:13</p> <p>N N 2:1,18 4:1 name 4:9 18:1 25:8 39:13 named 17:20 Narcotics 7:11 narrative 53:8</p>
---	--	---	--	---

<p>necessary 22:1 need 27:6 53:23 negatives 17:2 Neighborhood 8:24 never 16:3 17:10 42:21,21 49:21 50:15 night 23:4,10 28:21 Nineteen 11:24 nonadministr... 45:15 normally 45:17 north 2:12 7:25 8:3 39:3 note 29:17 noted 26:17 notes 53:9 notice 26:19 notified 41:2 N-word 47:18</p> <hr/> <p>O</p> <p>O 4:1 Oaks 2:3 object 20:8 observe 37:1 38:7 obviously 11:15 16:10 occasion 17:5 32:18 48:1,12 occasions 35:25 occur 9:21 occurred 8:2 39:4,8 48:3 offer 26:6 office 2:11 15:1 15:8 37:9 40:5 48:4 50:9 officer 21:24 22:9 26:23,25 29:21 36:1 officers 9:22 26:3,7,15,15 29:17,17 30:3 OFFICES 2:7 off-duty 34:5 oh 4:20 25:22 Okay 4:24 5:9 5:20 6:10 7:3,9 7:23 8:5,8,16 8:18 9:2,10,17 10:7,14 11:18 11:21 12:2,19 13:2,9,14,18</p>	<p>13:20,24 14:21 15:7,13,21 16:8,18 17:5,9 17:20 18:2,7 19:3,12,18 20:22 21:12,19 22:8,20 23:3,7 23:16,19,22 24:5,22 25:9 25:15,20,25 26:6 27:10,21 28:20 29:1,9 29:12 30:16,24 31:5,11 32:2 32:12 33:3,14 33:17 34:4,12 34:24 35:15,19 35:22,25 36:6 36:17,24 37:14 37:21,24 38:3 38:14,17,21 39:15 40:1,22 41:7,15,25 42:19 43:7,12 43:18,20 44:9 44:15 45:2,23 46:13 47:3,9 48:17 49:5,8 49:25 50:8 51:7,20 52:3,7 53:5,13,17,20 once 41:22,24 41:24 47:8 49:14 ones 41:17 on-duty 35:17 open 17:9,11 operations 9:20 9:21 44:14 order 6:25 19:23 25:17 37:19 40:25 41:22 42:16 43:5 45:10 49:8 orders 34:11 50:3 original 3:22,23 3:23 outcome 42:13 outliers 26:3 outside 21:1 outspoken 13:22 overlooked 24:16 oversee 9:19,23 31:10</p>	<p>overseeing 12:25 oversees 51:15 overtime 21:21 21:22 22:3,6,9 22:13</p> <hr/> <p>P</p> <p>P 2:1,1,11 4:1 page 2:20 3:15 24:2 52:14 pages 1:16 3:11 23:24 53:25 paid 35:21,23 36:2,3,10,12 paperwork 32:5 40:7 41:23 44:11,20 part 7:5 8:18 18:4,11 22:13 22:21,23 23:7 30:13 38:19 53:23 particular 7:10 14:2 18:12 24:22 29:16 40:23 51:24 53:4 partner 28:10 38:25 partners 10:4,4 patrol 7:3 pay 35:20,20 36:7 payroll 36:10 pays 13:10 Pederson 2:14 2:23 27:15 42:23 43:7 peers 52:3 people 21:11 26:12,18 27:5 46:5 perform 30:14 44:12 performance 15:15,22,25 16:14,19,20 17:4 performed 16:15 39:24 performing 44:19 period 14:12 31:12 32:15 33:12 persistent 13:11</p>	<p>person 6:7 18:16 19:24 21:2 31:4 34:22 40:6 43:12,13 personal 12:14 26:7,15,21 27:6 personality-wi... 13:21 personally 13:5 13:20 15:10 21:12 29:23 personnel 7:17 10:2,13 14:4 24:12 28:9 person's 43:15 phone 28:1 44:12 47:12 PHYLLIS 1:24 physical 9:20 place 52:1 Plaintiff 1:5 2:6 4:4 please 4:10 point 5:25 9:19 27:21 37:15 40:16 52:4 police 4:25 5:11 5:14 8:6 9:22 9:24 10:5 24:9 26:24,25 27:23 28:9 40:17 43:2,6,12,20 44:2,10 46:8 48:2,3 50:10 police-related 44:13 policies 17:19 26:14,17 policy 17:9,12 21:20,23 30:19 poorly 19:22,24 21:2 portion 7:23 position 5:3,20 39:16 positives 17:2 possible 22:6 24:20 28:4 49:24 POST 27:1,2 49:5 powers 40:17 43:2,6,12,20 44:2,10 48:2 PRACTICE 2:2 present 20:1</p>	<p>presentation 22:14 prior 5:9,12,22 9:7 15:2 42:15 42:18 private 10:3 problem 20:1,5 37:5 problems 18:22 37:2 process 25:2 productive 22:3 Professional 1:25 professionally 13:6,8 promoted 6:12 7:7 9:8 property 10:25 44:8 provides 26:22 proximity 39:2 public 10:4 purpose 32:2 pursuits 26:4 pushed 35:6 41:1 p.m 1:20</p> <hr/> <p>Q</p> <p>question 15:13 16:2 19:18 20:13 23:12,13 29:20,25 33:20 34:8,13 42:3 43:25 quite 7:20 24:11 24:14 31:1</p> <hr/> <p>R</p> <p>R 2:1,9 4:1 rank 31:1,5 ranks 27:4 rationale 40:25 read 51:4 really 5:23 6:22 28:12 39:6 reason 15:11 20:6,15 37:17 37:18 reasons 35:3,14 reassign 39:15 39:20 reassigning 39:19 recall 6:23 8:20 13:19 14:9,12</p>
---	---	--	--	---

14:16,25 15:21 16:18,22 17:3 17:5,8,20 18:6 19:6 23:3,13 23:16 24:6,22 24:24 25:4,15 28:6 29:5,9 30:19 32:5,16 32:17 36:17,22 37:6,9,18,24 38:10,14,21,21 38:24 39:9,13 40:5,22 41:1,7 41:10,18,25 42:14,15 45:16 45:18 47:9,11 47:16,17,19,20 47:24 48:12 receive 18:24 received 11:10 17:6 18:15 25:23 26:2,5 29:1 33:25 35:17 36:7 41:8,9 45:9 46:22 receiving 47:4 51:10 recess 46:20 recollection 17:23 recommend 39:19 53:11 record 3:3 4:10 18:11 42:23 refer 23:23 46:15 reference 18:13 referred 42:12 46:14 referring 18:10 40:19 48:23 52:25 reflect 19:22 21:2 reflects 19:24 regard 29:3 regarding 15:2 53:9 Region 7:20 Registered 1:25 regularly 9:13 relate 52:16 related 33:25 34:16 35:17 42:7 relates 34:14	relevance 12:12 remember 5:24 6:20 9:11 14:9 17:2 18:1,6 28:17 32:10,10 33:13 37:13 39:22 40:8 42:20 45:1 49:7,24 remove 52:17 reorganizations 8:12 rephrase 29:19 33:20 report 3:4 23:5 23:9,10 24:14 52:23,24 53:3 reported 41:12 Reporter 1:25 reporting 31:8 reports 15:19 22:14 24:17 reprimand 21:13 21:14 32:22 reprimanded 23:9 request 3:14 26:13 35:2,9 35:12 53:17 requesting 3:17 requests 27:5 require 51:25 required 33:18 33:22 requires 22:18 residence 32:3 resolve 21:7 resources 26:10 respond 27:5 responds 53:3 response 3:18 51:10 responsible 7:21 10:12 15:15,17 rest 25:2 restraining 25:17 restructured 5:17 restructuring 8:1 result 31:11 42:14 retaliate 50:13 retaliated 50:23 retaliation 50:11	retired 6:4 RETTKO 2:7,9 12:12,16 16:2 16:8 20:8 31:21 return 33:14,16 returned 37:15 37:24 reversal 3:17 review 15:16,25 23:20 reviewed 18:4 53:15,18 reviews 16:14 16:19 right 5:6,18 9:14 11:15 12:19,21 14:24 16:6 17:1,11 18:4 18:10 20:1,19 21:12,25 23:1 23:23 24:3,4 24:18 28:22 29:4,14 30:5,7 31:6,20 33:6 34:17 35:9 36:4 40:16 44:20 45:11 52:12 robbery 10:24 Robert 25:18 ROBIN 2:13 role 24:10 roughly 12:11 rpederson@mi... 2:14 rule 34:1 rules 48:18 run 41:20 S S 2:1 3:1 4:1 sake 19:18 Salazar 51:18,23 52:3 saw 16:14 saying 27:16 47:16,19 scene 31:2 53:4 school 11:9 science 11:18 Scrignuoli 3:16 second 4:20 29:16 section 35:7 50:3 51:15 52:1	sector 10:4 12:24 see 14:7 50:8 seeing 14:12,16 16:18 seen 15:18 16:24 51:2,8 send 19:19 27:13 49:5 sending 20:25 23:3 24:6 44:3 sense 9:20 sensitive 10:24 sent 3:22 9:3 17:6 19:4,25 21:2,9 23:8 24:24 45:2,4 48:21 50:1 51:14,17 sentence 25:25 sergeant 6:15,16 6:18 8:13 9:6 9:22 24:9 31:9 31:10 53:7 sergeant's 24:10 serious 29:13 seriously 30:9 serve 6:8 41:22 serving 37:11 setting 37:8 seven 12:20 severe 28:8 30:21 33:10 Sgrignuoli 1:15 2:21 4:3,11 Shannon 1:4 4:14,17 12:19 13:2 14:8,13 15:2,16,22 16:12,21 19:19 21:13 25:15 28:9 38:16 shift 22:19 28:24 40:13 shifted 9:13 short 6:19 14:12 46:18 shortly 11:20 46:23 show 23:19 44:7 51:1 sick 36:14 side 7:25 8:4 signature 16:25 24:2,21 signed 51:4 significant	39:12 simply 43:5 situation 22:7 22:15 30:21 situations 44:16 six 6:9 12:20 skip 20:4 skipped 19:23 slang 21:15 Smith 18:21 32:3 47:7 snow 32:13 someone's 30:9 34:15,23,24 soon 12:22 28:15 sorry 18:1 19:2 52:10,19 sort 40:18 sound 12:21 19:1 speak 10:17 30:6 46:23 49:6 speaking 13:24 25:4 37:2,5 46:13 specific 7:17 13:4 14:10 26:2 36:10,22 40:2 specifically 15:24 23:24 27:17,19 31:18 41:2,7 specifics 14:25 37:7,9 45:18 spell 4:10 spend 8:10 spent 8:13,14 spoke 38:8 45:12 squad 3:4 27:23 squads 53:14 staff 40:6 start 8:5 13:6 34:9 state 7:20 35:13 STATES 1:1 status 25:9 32:4 34:5 35:16,19 36:9,11,19,20 steps 29:3 30:18 Stigler 25:1 stint 9:4 22:21 22:23 Strike 22:24
---	---	---	---	---

stutter 38:7 submitted 3:16 subordinate 10:2 31:2 subordinates 20:3 subpoena 33:23 34:7,9,21,22 34:25 35:10,13 38:5 43:14,17 49:20 subpoenaed 34:4,20 43:19 subpoenas 33:25 34:11 subsections 11:1 substance 28:6 suicide 17:25 18:25 Suite 2:3,8 supervise 10:1 10:11 25:12 supervised 10:8 supervising 10:15 supervision 16:13 21:5 30:17 44:25 45:3 supervisor 16:4 16:5 21:7 28:16 30:20,25 31:6,7 37:8 39:1,6 53:3 supervisors 15:23 22:1 25:23 30:23 supervisory 31:1 supervisor's 21:10 support 26:25 sure 4:11 8:21 20:15 22:2 24:3 28:2 33:21 51:6 suspect 17:20 18:24 47:18 suspend 37:14 42:16 43:5 suspended 37:22 40:20 41:19,21 43:13 43:20 44:6,6,9 44:10,18 45:2 45:14,19 46:7	48:1,19 suspending 42:25 43:1,2 suspension 40:20,22 41:16 42:5,10 43:3 43:15 44:2,2 45:6,14 46:1 46:10 suspensions 44:1,5,25 sustained 31:19 Swanson 41:5 46:22 47:5 sworn 4:5 S-G-R-I-G-N-U... 4:12 S.C 2:7 T T 3:1 take 6:9 21:6 29:3 30:17 40:17 45:17 46:18 48:6 51:6,10,13,23 52:12 53:20 taken 45:16 46:20 talk 13:5 44:4 47:3 49:12 talked 19:5 talking 14:4 40:7 43:1 task 8:24 30:13 39:21 tasks 39:25 team 26:25 27:1 27:2,9 tell 19:12,15 20:6,15,19,22 28:16 29:6 47:12 48:6,9 48:17 49:15,22 telling 23:16 47:9,17 temporary 25:16 term 20:18 testified 4:5 testify 33:18,23 34:1,4,10,18 35:1 43:13,21 48:9,14 49:19 testifying 25:16 32:23 38:4,11 42:8,22 48:18	testimony 4:14 42:2,20 Thank 11:4 thing 5:19 40:18 things 22:17 27:7 39:23 think 4:18 8:22 8:22 9:3 12:20 13:17 14:11 15:11 16:13 19:24 20:17 24:15 27:7,20 29:19 33:13,16 34:21 38:9,16 39:22 40:13 47:2 50:16 Thomas 24:1,8 thorough 13:12 thought 41:15 41:18 42:4 three 12:10 28:25 time 6:20 8:13 8:14,15,18 14:7,12 19:5 22:16 28:17,18 28:22 29:7 30:25 31:13 32:15 33:12,17 34:6 36:14,14 36:14 37:4 38:15 51:6,19 times 5:17 49:14 tip 18:15 title 5:10 6:11 24:20 today 4:13 told 39:6 42:25 47:13 topic 25:24 total 8:15 Trafficking 7:12 train 21:10 training 25:21 25:23 26:1,2,5 26:6,9 transcript 3:22 3:23 53:24 transfer 39:18 39:19 49:9 treated 50:16,22 TRO 27:11 trouble 38:4 try 33:14 45:11 48:25 trying 4:18	14:11 39:22 40:13 Turcinovic 24:24 twice 41:23 two 16:9 25:25 32:7,21 33:15 43:25 47:5 50:25 two-and-a-half 8:15 two-page 23:25 type 13:25 26:5 44:16,24 45:6 types 27:5 43:25 U ultimately 16:16 17:24 18:23 undergraduate 11:16 understand 4:13 29:19 34:8 42:3 45:5 understanding 10:1 unexpected 22:13 unfortunate 30:13 unhappy 21:16 UNITED 1:1 University 11:7 unpaid 35:23 unsuccessful 18:19 unusual 41:11 use 17:24 21:15 26:4 usually 28:23 UWM 11:17 V vacation 35:5 36:14 vaguely 47:24 variety 9:15 10:6 22:12 27:4,7 35:3,14 44:4 45:25 various 8:11 18:18 verbally 32:22 verified 16:24 versus 4:15 violated 48:18 violent 10:22	visit 31:24 vs 1:6 W Wagner 6:5 want 13:5,7 23:23 24:3 wanted 18:16 47:14 wants 30:14 warrant 17:7 18:18 wasn't 24:16,20 37:4 38:19 41:23 way 13:15 16:1 22:4 29:23 30:5 37:3 week 32:21 weeks 11:20 went 6:21 8:23 8:25 32:3,6,18 47:6,7,7,25 48:13 west 2:3,7 39:3 we've 25:23 48:23 51:1 52:24 whichever 13:6 wide 9:15 Wilkinson 25:18 WILLIAM 2:9 Wisconsin 1:2 1:19 2:3,8,13 witness 2:10,20 4:4 12:17 20:12 31:22 43:3,8 witnessed 42:21 woman 14:24 words 19:8 work 5:4 7:14,16 10:2 11:1 17:3 26:16,21 27:7 28:22 31:12,15 32:9 33:12,14 33:16,17,21 36:1,3,7,18,19 37:14,25 44:3 44:22 45:3,4 46:2 47:22 worked 7:4,6,6 12:23 13:1 33:24 40:13 51:18 worker 13:10 working 7:15
--	---	---	---	---

15:4 16:12 22:18 31:3 38:2 44:18 workman's 51:16 wouldn't 25:2 29:11 wrapping 11:19 write 19:9,12 49:9 wrong 19:9 wrote 49:1 X X 2:18 3:1 Y Yeah 15:14 52:11 53:10 year 5:23,25 years 6:22 8:15 11:24 12:20 year-and-a-half 5:23 6:1 yell 21:15 Z Zeidler 2:12 0 07 9:7 08 9:7 09 9:1,3 1 1 1:16 3:3,15 23:20 24:23 25:5 1st 22:20,24 1-4 4:2 1:00 1:20 10 3:15 9:1 10,000 27:3 10:00 1:20 100 2:24 1001 2:2 101 2:3 106 3:11 1089 1:6 11 9:1 13 4:21 12:17 14th 8:9 15 12:17 150 2:8 15460 2:7 16 1:6 12:17 19 31:11	1994 8:7 2 2 3:4 8:23 52:13 53:6 20 6:22 2000 6:17,19 12:1,4 2009 6:17 8:19 2012 4:21 12:21 2013 12:21 2014 18:16 21:19 23:25 2015 5:8,9 21:20 22:20,24 27:21 31:12 37:1 48:12 52:25 2019 1:19 23 3:3 28 1:19 3 3 3:5 6:21 7:3,25 8:2 51:2,8,24 4 4 2:22 3:7 8:1,3 23:24 53:21 47 18:13 5 5 7:7,8,25 8:2 9:8 23:24 24:2 51 3:5 52 3:4 53 1:16 3:7 53005 2:8 53092 2:4 53202-3653 2:13 54 3:11 54-106 53:25 56 3:15 6 6 6:19 7:3 18:16 7 7 8:1,3,22 23:25 7th 2:12 7:00 28:24 8 8:00 28:25 841 2:12	9 99 2:23		
---	--	----------------------------	--	--